



FILING VIA ECFS

May 22, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, DC 20554

RE: *In the Matter of Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200

Dear Ms. Dortch:

Millicorp (FRN 0018930511) ("Millicorp"), submits its VoIP Numbering Trial Proposal ("Proposal") in the aforementioned dockets. According to the *FCC VoIP Numbering Order*, the Federal Communications Commission ("Commission") directed any provider wanting to participate in the VoIP Numbering Trial to submit a trial proposal.¹

Milicorp is an interconnected VoIP provider with a pending petition for a limited waiver of section 52.15(g)(2)(i) of the Commission's rules and therefore qualifies for participation in the Commission's VoIP numbering trials.

¹ *In the Matter of Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200, Order, FCC 13-51 (rel. April 19, 2013) ("*FCC VoIP Numbering Order*").



Please do not hesitate to contact me with any further questions or concerns.

Sincerely,

A blue ink signature of Duane Dyar, written in a cursive style, is positioned above a horizontal line.

Duane Dyar

Vice President/Operations

Millicorp

Cc: Julie Veach, Chief, Wireline Competition Bureau
Marilyn Jones, Wireline Competition Bureau

Millicorp VoIP Numbering Trial Proposal

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Introduction

In 2005, the Commission granted SBC Internet Services (SBCIS), a provider of IP-enabled services, a limited waiver of section 52.15(g)(2)(i) of the Commission's rules, to enable SBCIS to obtain direct access to telephone numbers.¹ On April 18, 2013, the Federal Communications Commission ("Commission") adopted an Order expressly waiving Section 52.15(g)(2)(i) of the Commission's rules for purposes of participating in a limited trial giving certain VoIP providers direct access to numbers ("VoIP Numbering Trial").² The Commission in the *FCC VoIP Numbering Order* limits the VoIP Numbering Trial to VoIP providers that have already sought waivers to obtain direct access to numbers and sets forth several conditions of the VoIP Numbering Trial.³ Specifically, the Commission orders participating providers to submit a numbering proposal, which (1) includes a certification that the provider will comply with the terms and conditions of the six month trial waiver including any FCC and State reporting requirements, (2) identifies the rate centers or LATAs in which the provider wishes to have numbers directly assigned, and note how many numbers it proposes to receive as new numbers and to port in from existing or new customers, and (3) details the phase-in process to implement the trial.⁴

¹ See *Administration of the North American Numbering Plan*, CC Docket No. 99-200, Order, 20 FCC Rcd 2957 (2005).

² *In the Matter of Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200, Order, FCC 13-51 (rel. April 19, 2013) ("*FCC VoIP Numbering Order*").

³ *FCC VoIP Numbering Order* at ¶¶ 89, 99-108.

⁴ *Id.* at ¶ 101.

Millicorp (FRN 00189305110) submits the instant VoIP Numbering Trial proposal ("Number Trial Proposal") to demonstrate its intentions for satisfying the conditions outlined by the Commission.⁵ The Number Trial Proposal outlines our eligibility for the VoIP Numbering Trial. Millicorp has included a certification of compliance that Millicorp will comply with the terms and conditions established by the Commission for this limited waiver in the aforementioned dockets. This Number Trial Proposal also identifies the LATAs in which Millicorp intends to directly obtain numbers, along with the amount of numbers in each LATA to be obtained in new blocks of numbers and to be ported from existing or new customers. Finally, Millicorp identifies its phase-in process to implement its Number Trial Proposal. Accordingly, Millicorp submits this Trial Proposal for comment and Commission approval.

⁵ Millicorp hereby requests leave to file this Number Trial Proposal out of time and for the Commission to accept this filing as if it had been timely filed. Millicorp also respectfully requests for the Commission to approve Millicorp's Number Trial Proposal to enable Millicorp to participate in the VoIP Numbering Trial. Millicorp has limited experience with numbering matters and was unable to timely complete certain research regarding NECA, ATIS LRN assignment practices, number pooling, and the Telecordia database, among other things. Further, it is in the public interest for the Commission to permit Millicorp's participation in the VoIP Numbering Trial because it will ensure a diversity of trial participants, thereby improving the information gleaned by the Commission from the trial. Moreover, no party will be adversely affected by Commission acceptance of Millicorp's Number Trial Proposal.

Eligibility

The Commission limited the VoIP Numbering Trial to VoIP providers that have already sought waivers to obtain direct access to numbers.⁶ On March 14, 2012, Millicorp filed its Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources in CC Docket No. 99-200. Accordingly, Millicorp indicates with this submission its intention to participate in the VoIP Numbering Trial based on its Petition for Limited Waiver.

Trial Markets

The Commission asks participating providers to identify the rate centers or LATAs in which they wish to have numbers directly assigned and to note how many numbers in each rate center or LATA it proposes to receive as new numbers and how many it proposes to port from existing or new customers.⁷

Millicorp proposes to have numbers directly assigned in the following LATAs with the associated allocation of new numbers versus ported number.

- LATA 939 (Fort Myers, FL) – Direct Allocation 1,000 block, Up to 2500 ported TNs
- LATA 460 (Fort Lauderdale, FL) – Direct Allocation 1,000 block, Up to 2500 ported TNs
- LATA 440 (SW Georgia) – Direct Allocation 1,000 block, Up to 2500 ported TNs

⁶ *Id.* at ¶ 89.

⁷ *Id.* at ¶ 101.

Implementation Process

The Commission asks participating providers to describe the process in which the trial will be implemented. Millicorp has a multi-phased approach that will be used to implement the Number Trial Proposal.

The initial setup phase (Phase 1) will consist of the following actions:

- Acquire a new OCN from NECA (National Exchange Carrier Association)
- Setup and test SIP trunks with Neutral Tandem (Inteliquent)
- Acquire direct allocations in the desired LATAs from NANPA (North American Numbering Plan Administration) after providing the FCC and appropriate State Commissions with a thirty day notice of intent to acquire new numbers.
- Set up account with NPAC (Number Portability Administration Center) for LNP capabilities
- Populate LERG and BIRRDs with the appropriate routing and rating details and nominate Neutral Tandem as the “Local Tandem” and “Access Tandem” for each T-Block LRN
- File the requisite Federal, State and Local notices for number allocations and reporting requirements including NRUF reports

Phase 2 will include testing and verification of NANPA assigned T-Blocks:

- Test and turn up of newly assigned T-Block TNs with test sites in each trial LATA.
- Test calls from various destinations including both landline and VoIP providers, as well as ILECs, CLECs, and wireless carriers, to verify and confirm routing, billing and call completion statistics
- Test 911/E911 capabilities and services
- Document and source root cause issues for any problems encountered during this phase and complete mitigation procedures for any known issues

Phase 3 will include testing and verification of LNP (Line Number Porting):

- Complete the initiation of LNP requests with a minimum of three carriers to test use cases
- Update LERG with the appropriate LRN upon the completion of LNP
- Test calls from multiple sources and destinations including both landline and VoIP providers as well as ILECs CLECs and wireless carriers to verify routing and call completion
- Test 911/E911 capabilities and services

- Document and source root cause issues for any problems encountered during this phase and complete mitigation procedures for any known issues

Phase 4 will include testing and verification of New TNs with customers

- This phase will not be completed until all other phases have been completed and any documented issues rectified
- Test and turn up newly assigned TNs in the assigned trial LATAs
- Test calls from multiple sources and destinations including both landline and VoIP providers, as well as ILECs, CLECs, and wireless carriers, to verify routing and call completion
- Test 911/E911 capabilities and services
- Document and source root cause issues for any problems encountered during this phase and complete mitigation procedures for any known issues

Phase 5 will include testing and verification of LNP with live customers

- This phase will not be completed until all other phases have been completed and any documented issues rectified
- Initiate LNP with a live customer
- Update LERG with the appropriate LRN upon the completion of LNP
- Test calls from multiple sources and destinations including both landline and VoIP providers, as well as ILECs, CLECs, and wireless carriers to verify routing and call completion
- Test 911/E911 capabilities and services
- Document and source root cause issues for any problems encountered during this phase and complete mitigation procedures for any known issues

Compliance Certification

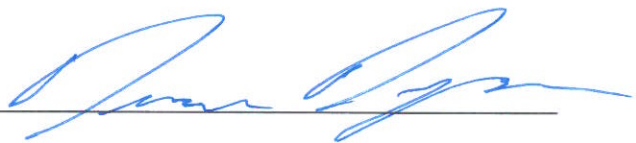
Certificate of Compliance

By executing this certificate, I certify that, in its participation in the VoIP Number Trial, Millicorp, Inc. will:

- 1) Comply with the FCC's number utilization and optimization requirements;
- 2) Adhere to numbering authority delegated to the states;
- 3) Observe all industry guidelines and practices, including filing NRUF Reports;
- 4) File requests for numbers with the FCC and state commission at least thirty (30) days prior to requesting numbers from the administrators;
- 5) Be capable of providing service within sixty (60) days of activating the numbers requested;
- 6) Maintain at least sixty-five percent (65%) number utilization across its telephone number inventory;
- 7) Offer IP interconnection to other carriers and providers;
- 8) Work to ensure that its carrier partners comply with applicable law, including inter-carrier compensation obligations;
- 9) Provide state commissions contact information when requesting numbers in that state;
- 10) Consolidate and report all numbers under its own unique OCN;
- 11) Comply with the reporting requirements mandated by the Commission in paragraph 103 of the *FCC VoIP Numbering Order*;
- 12) Provide customers with the ability to access all N11 numbers in use in a state; and
- 13) Maintain the original rate center designation of all in its inventory.

Date 5/21/13

Signature: _____



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